

## Flamingo Land and the National Park- privatising the gateway to Loch Lomond

### Description

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06 PROJECT DEVELOPMENT  
DESIGN SOLUTIONS  
PARAMETERS PLAN



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Extract from Flamingo Land's revised Planning Application illustrating the loss of what is now public be intensively developed with woodland lodges

**In the last couple of weeks Flamingo Land, which the multi-millionaire developer Gordon Gibb has tried unsuccessfully to rebrand as Lomond Banks, has become a national political issue. By that I don't mean a party political issue – most politicians, both nationally and locally, are still sitting on the fence – but one which is of concern to a large part of Scotland's population. The revised Planning Application, which was made public three weeks ago, has attracted widespread media coverage and has become a significant "story". That has increased awareness among the general public dramatically and along with that public concern: how it is that our public authorities are proposing to develop and privatise a key public space in a National Park and at the "gateway" to Loch Lomond? The number of objections lodged through the online portal set up by Ross Greer MSP and the Greens ([see here](#)) had reached 52,716 this morning and counting. This makes Flamingo Land the most contested Planning Application in Scottish history.**

While the likelihood is that the decision on whether or not Flamingo Land goes ahead will ultimately be decided politically, the detailed planning proposals are nevertheless important. For those concerned about the development, the risk is that the Loch Lomond and Trossachs National Park Authority tries to dismiss or minimise the importance of the vast majority of objections on planning grounds, claiming they are too general. It's significant therefore that a number of detailed objections on specific issues are now being lodged on the Planning Portal ([see here](#)). Following my post on "Flamingo Land and the privatisation of public land at Balloch" ([see here](#)), this post takes a more detailed look at how Flamingo Land's proposals will affect the ability of the public to enjoy the area.

## **What's at stake**



Part of the Riverside Site with the River Leven just visible. It is proposed to build 44 holiday lodges along this broad strip that runs along the Leven

Almost all the land contained within the planning application (boundary above) can currently be enjoyed by the public. Or, as the Design Statement puts it: “*The baseline existing site incorporates: Areas of woodland and greenspace used as publicly accessible open space*”. That space includes the Pierhead area, the Riverside, Drumkinnon Woods, the former grounds of Woodbank House and the strip of woodland west of Drumkinnon Bay which is leased by the National Park Authority. This is not to claim that the quality of the experience all this land offers is always high, that it could not be improved or that none of it should be developed – but the starting position is one of open access for all.



From the very start, Flamingo Land and the LLTNPA have claimed that they wish to maintain public access throughout the site. In planning terms this is a crucial issue because one of the LLTNPA's four statutory duties is ***"to promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public"***. If the details of the proposals effectively exclude people from freely enjoying a large proportion of what is the gateway to Loch Lomond, which makes the site even more important in terms of public access, then the LLTNPA should be rejecting the application in principle.

This post argues the evidence from the 9 sections of the "Design and Access Statement" lodged with the revised Planning Application demonstrates conclusively that public access won't be maintained. In effect the proposals are that a large proportion of what is now public space available for public enjoyment will effectively be converted into space that can only be used or enjoyed privately, for a fee.

### The proposed development of green space



Flamingo Land's conceptual presentation of its plans

Flamingo Land's Planning Application appears to deliberately minimise the extent to which public green space will be lost. It contrasts the yellow of the "resort" with the green "woodland" implying large areas of unspoilt countryside will surround the "main development". The truth is that most of the woodland will not be left green at all but filled with holiday lodges and some housing.

The green areas may have been zoned for "Visitor Experience" by the National Park Authority in the Local Development Plan but the impact of filling these with lodges will not be that much less than the proposals by Cala Housing to cover the Riverside Site in housing which were rejected 30 years ago. You cannot cover an area with lodges without affecting public access and the quality of enjoyment that people derive from this. There is lots of evidence for this in the Access and Design Statement.

### Artist's impression

Privacy for lodges achieved through:

- screening from main footpaths with appropriate species
- localised path narrowing and signage
- different materials and details used for footpaths at lodge "clusters"

Access for lodge users by foot, cycle or buggy  
(car parking beside lodges only possible if they are located directly beside existing access roads)



"Light touch" improvements to existing paths:

- overall width extended to 3.8 metres to allow occasional use by emergency vehicles
- low level lighting
- continued public use

Minimal disturbance of existing ground achieved through:

- clusters of lodges share infrastructure and access
- prefabricated lodge construction, lodges supported on posts
- lodges located in least dense existing planting
- decking to provide outdoor spaces, decks orientated to best suit specific location



The key word here is privacy! The clusters of lodges and associated infrastructure such as decking effectively remove land from public access. Access around the Lodges may not, initially, be explicitly banned but it will be controlled and prevented by design: *“These lodges will be accessible by foot or golf buggy only along public access ways, utilising discrete, attractive signage to discourage public access into more private areas”*. If you decide to wander over to cluster of lodges, there will be no doubt you are invading someone else’s privacy. It will be hard to do so in any case, apart from by path, because of all the new trees planted as “screening”. Defensive gardening is likely to be a more accurate description. Most people will feel deeply uncomfortable in such circumstances and keep away whatever the signs say initially. It will, however, only take one break-in before people are asked to contact site management before entering or “private” signs start appearing. The overall effect is that public access will be limited to a few paths compared to what people have at present.

The converse of the statement on “Access”, that *“Paths through woodland will continue to be accessible by the public”*, is that the public will be excluded from the rest of the area. Land that we currently own.

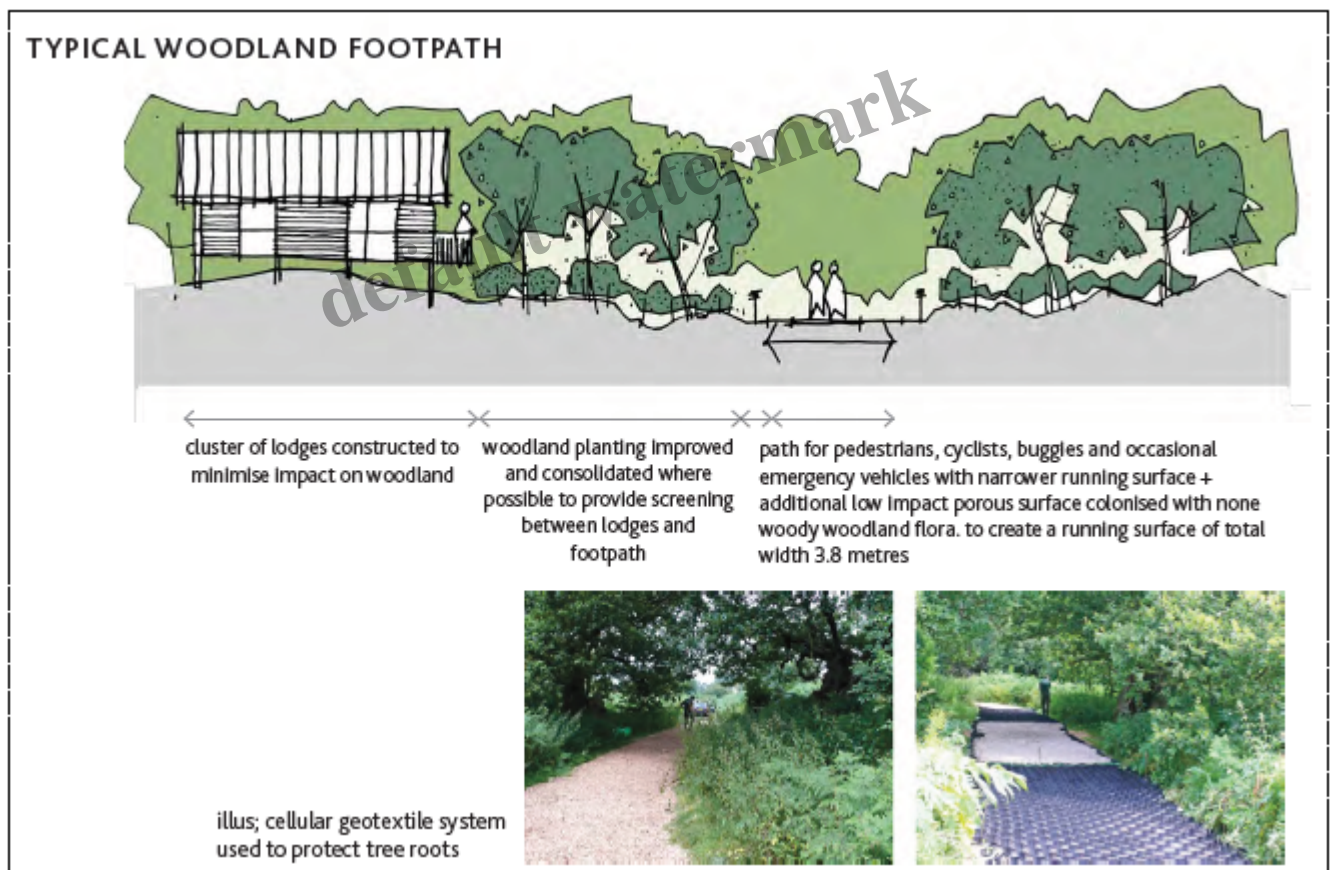
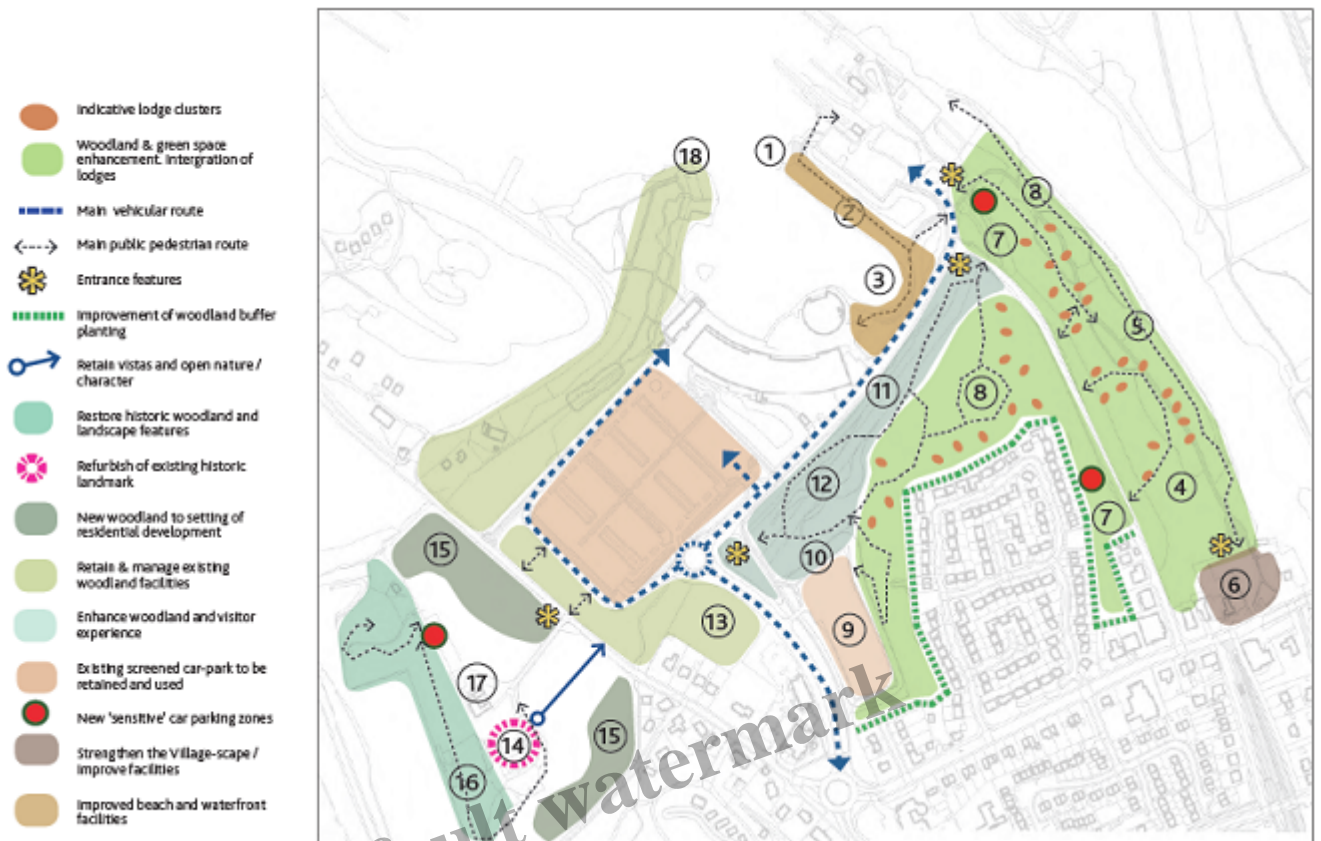


Illustration of woodland paths which accidentally illustrates the loss of public access and open space

Devoting most of the land to lodges for private use and protecting them for private enjoyment, is not good for children who want to play, people whose dogs currently run free or for people who simply enjoy walking off-path. I exaggerate slightly. Some public area will apparently be retained for picnics, “gathering” and public art.



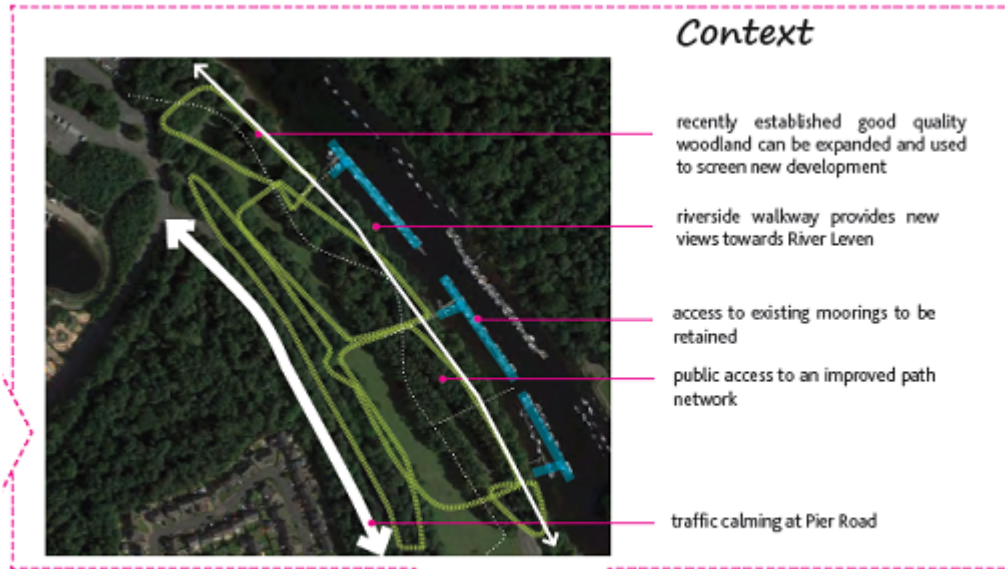
The Riverside section of the site is the broad green band along the River Leven on the right, Drumkinnon Woods the green and grey area in the centre. The brown spots mark lodge clusters, not individual lodges.

While the map above helps illustrate how lodges will dominate the woodland, their impact will be slightly different on the Riverside and Drumkinnon Woods part of the site.

### Impact of the Riverside part of the development on public enjoyment

On the Riverside, public access will effectively be channelled down an upgraded path along the shore of the River Leven.





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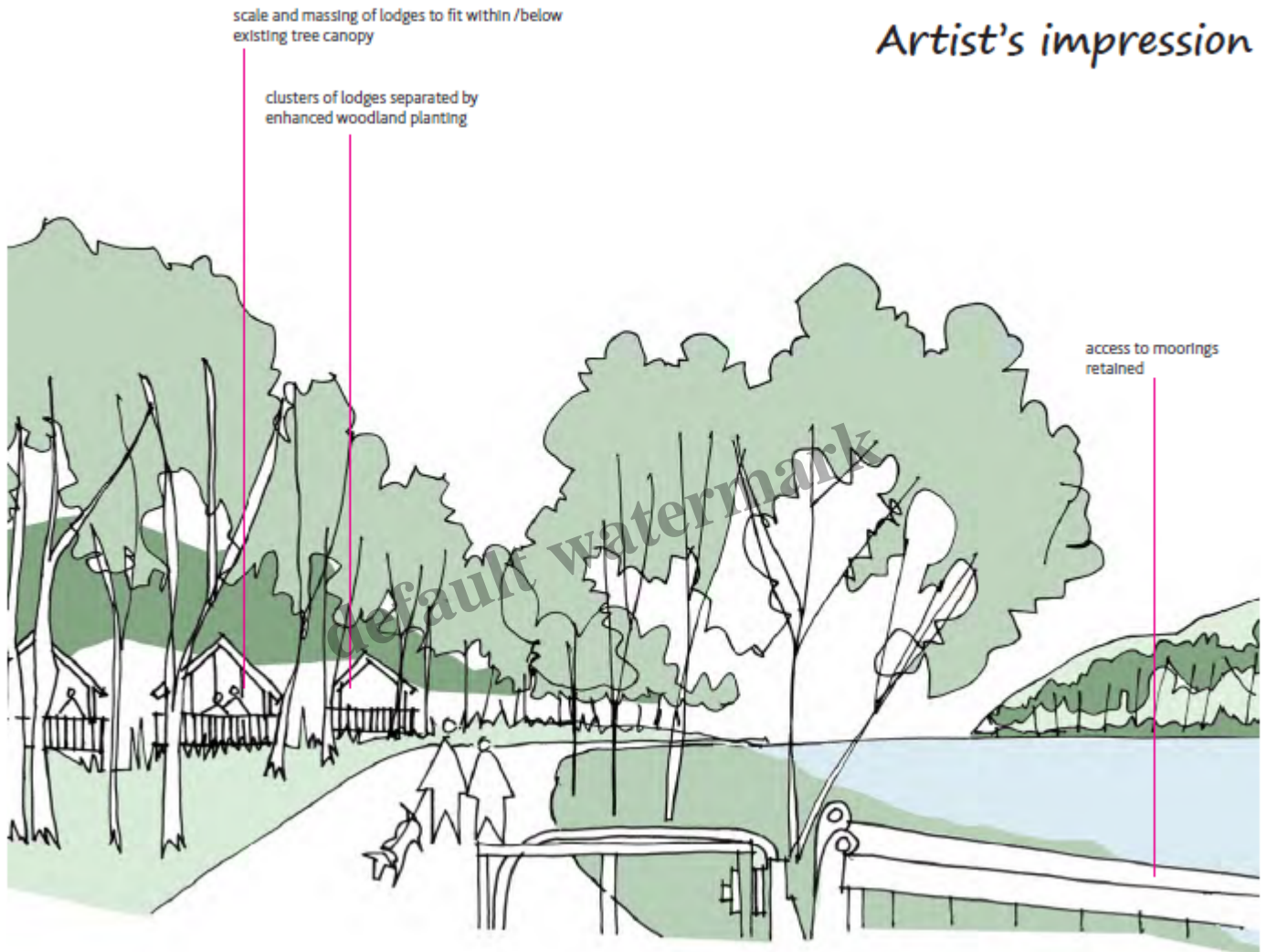
Extract from design statement illustrating how public access is to be squeezed into the strip by the River Leven. This diagram doesn't show the two new "woodland" parking areas.

What with the road, new parking, enhanced buffer planting and monorail running along the left hand side of the site no-one is going to want to walk there. Access down the middle will be blocked by clusters of lodges and who would want to walk through what is effectively a posh chalet park in any case. That leaves access along the shoreline.

Along the shore Flamingo Land trumpets that access to the moorings will be retained. While access to the moorings used by the various boat clubs is to be maintained, this could hardly be otherwise, and this is the route taken by the John Muir Way. Whether Flamingo Land intends to renew the leases that the Boat Clubs have with Scottish Enterprise is less clear. Its quite possible in future that they will find

some other “better” use for the river, luxury houseboats maybe, which will leave the public sandwiched between two sets of “luxury” developments.

The artists impression shows what access will be left:



## **Impact of the Drumkinnon Woods part of the development on public enjoyment**

The proposals for Drumkinnon Woods, where the woodland is far more continuous, are rather different. These woods were NOT included in the Local Development Plan as part of the area to be developed for “Visitor Experience” and the LLTNPA should have never, as a consequence, allowed the Planning Application to include it. Flamingo Land is proposing 32 Lodges for these woods which will be located in glades, that is areas of younger trees or open space between the older trees.

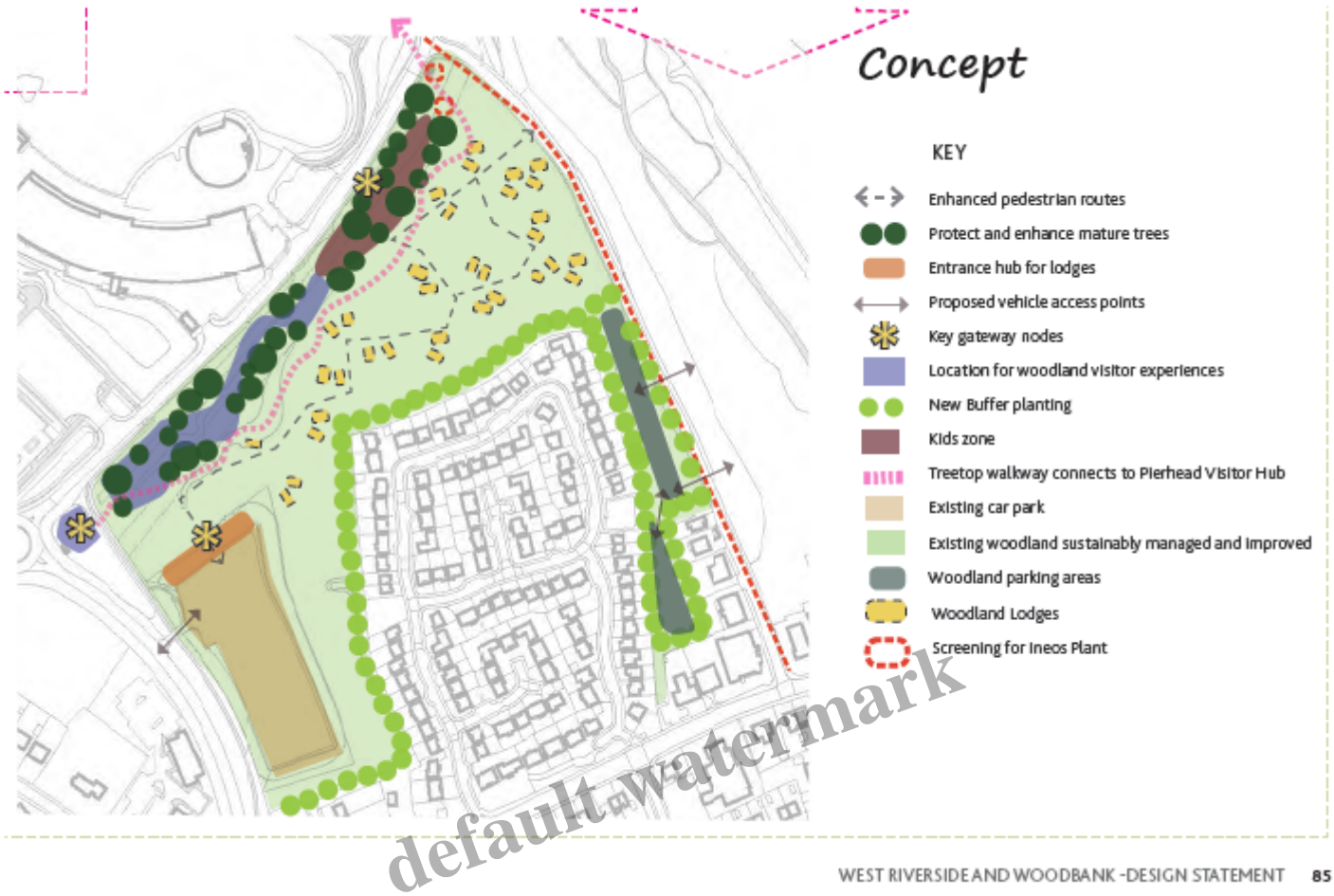




A glade within Drumkinnon Woods

What this means is that the main areas of open space on the southern eastern half of the site between the trees are all to be developed, effectively excluding the public.





The dotted lines between the lodge clusters are described as “enhanced pedestrian access” – for lodge users may be, but not for the public. Besides the issues of walking past lodge doors, the general public will have to negotiate their way through an “entrance hub”. Elsewhere this entrance hub is described as providing “Security, management & ticketing (5m max height above adjacent car park)”.

## 7.4 ZONE D: DRUMKINNON WOOD AND BAY

### Woodland experiences

A number of visitor destinations will sit between existing trees, which will be retained and protected as they form an essential part of the experience for visitors, as well having an ecological importance. Level changes can be used to benefit the development, siting play areas and adventure facilities within localized depressions in the landscape which can provide natural screening.

Different character areas will complement their woodland setting:

- Exploration – a carefully sited and located woodland children's area. This will focus on wildlife, conservation and on supporting biodiversity; it will provide a natural, outdoor woodland experience for children aged three to nine
- Views – a high level woodland walkway which will allow all visitors to enjoy a tree-top experience - an opportunity to travel between trees at just below canopy height
- Adventure – starting points for low key eco-forest adventure experience will provide a landmark at the roundabout entrance to Loch Lomond Shores

### Existing car park

There is an existing car park in this area which is used by Loch Lomond Shores for overflow car-parking. It is well screened and at a lower level to adjacent woodland. A new entrance building with a woodland character will be located at its southern edge, within the site and built upon existing topography. It will provide an arrival point for lodge visitors and buggy storage, and will also act as a gateway to the woodland.

### Boathouse woodland promontory

This will be the location for storage of equipment and operation of water-related activities.



Visitor experiences integrated with Loch Lomond Shores: Starting points for low key eco-forest adventure experience provide a landmark at roundabout entrance to Loch Lomond Shores

Children's area is well connected to Loch Lomond Shores and the proposed Pierhead development

### Different character areas:

- Exploration
- Views
- Adventure



Children's area - woodland themed



Elevated tree top walk and viewing



Elevated tree top walk and viewing



Children's area - woodland themed



Precedent image: boathouse



Precedent: woodland adventure ride

Along the north west side of the site is an area devoted to “woodland visitor experiences” and a “kids zone”. There is no indication about whether these, or the tree top walkway to the Pierhead Visitor Hub, will be open to public for free. It looks more “resort” than enjoyment of the natural woodland environment: “Children’s Play Area. Adventure themed rides and walkways (all installations below tree canopy, max height at entry points up to 12m)”.

How this adds anything to the existing Treezone on the north side of Loch Lomond Shores is unclear ([see here](#)). How many Go Apes does Balloch really need?).

That’s not quite how Flamingo Land presents this though:

## 7.4 ZONE D: DRUMKINNON WOOD AND BAY

### Carefully designed footpaths

In order to minimise impact on existing ecology, and to ensure that the public can continue to use existing walks through the woodland, existing pathways will be retained and improved using low impact methods such as cellular confinement and porous surfaces.

### Appropriately designed woodland lodges with a minimal footprint

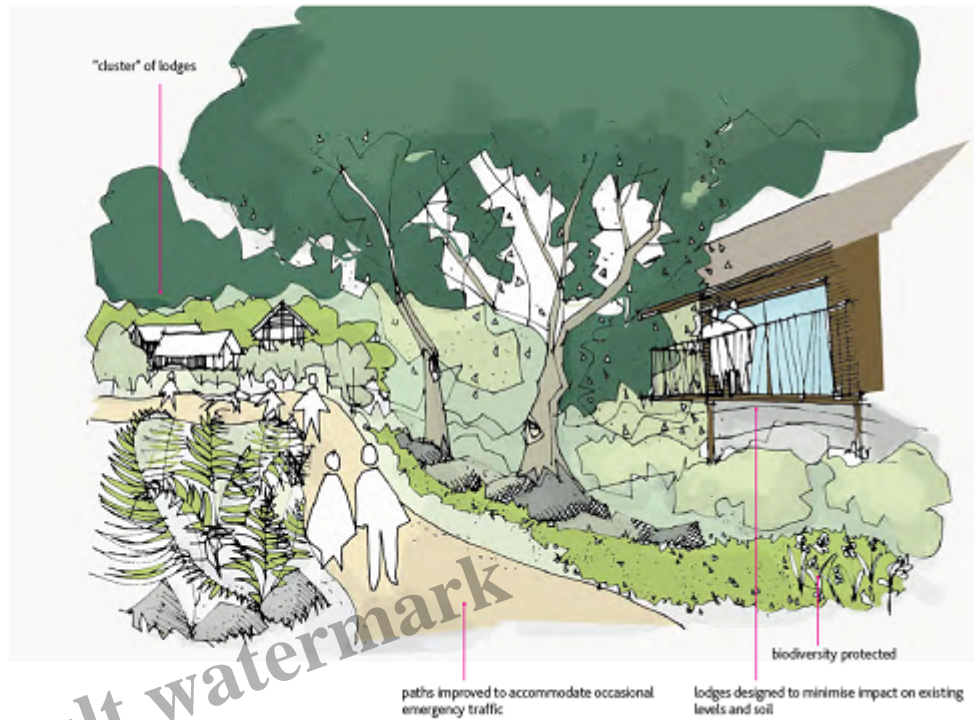
Drumkinnon Wood is proposed as the setting for a small number of ecologically designed and carefully located holiday lodges. Customer access will be by golf buggy, rather than by car, and public access will be maintained throughout this area of the site.

Lodges will be situated in minor woodland glades and natural openings between trees to minimize tree loss. Alternatively, unhealthy or short-lived tree species will be removed to create space for lodges and enhance ground flora; for example, a particular species deemed to be of less conservation value e.g. rhododendrons could be removed.

### The setting and design of lodges will provide:

- Woodland as the predominant experience of the space, with continuous woodland cover between lodges and a woodland character as the basis for lodge designs.
- Lodges will be clustered together to maximise privacy while minimising the need for any intrusive boundary treatments. They will be positioned and oriented to screen views towards them, and to retain privacy between lodges, while retaining a secluded woodland feel.
- A sustainable construction type with minimal excavations and a minimal footprint is proposed, with lodges supported on posts, rather than slab foundations. Small plant and machinery construction techniques will be used with minimal changes to existing ground levels.
- Materials, massing and scale which are appropriate for a woodland setting – for example prefabricated single storey lodges using timber cladding and decking, installed on post for minimal disturbance.
- All development to be located within/below the existing tree canopy.

### Artist's impression : woodland experience

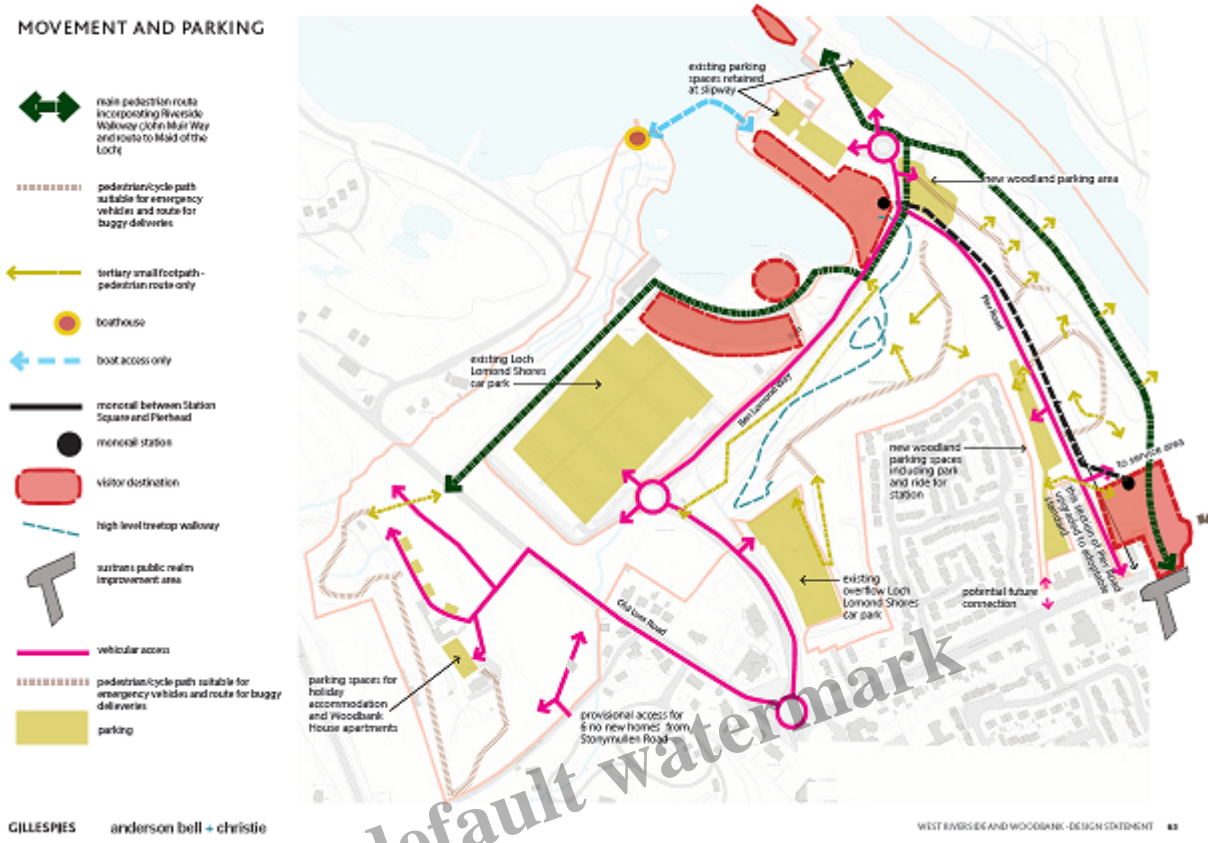


The “small number” of Woodland Lodges is, to remind you, 32

The main reason for ensuring that the public can continue to use existing walks through the woodland appears to be so they can access the resort of the pierhead.

## The overall design concept, public access and enjoyment





The premise behind both woodland plans appears to be that they should be designed to channel people as quickly and effectively as possible to the “complex” at the Pierhead, whether they arrive by cars or at Balloch station: *“A new/enhanced Riverside Walkway will form a section of the John Muir Way. It will be designed to encourage visitors to move towards Loch Lomond Shores and the new Pierhead and will be well lit and supervised.....”*

The pierhead development will of course remove land by the lochside, which is the most important of all in terms of people’s ability to enjoy the loch and the landscape, from the public realm and turn this into a paying facility.

There are also a significant numbers of new parking areas – which again effectively remove space which could be used with public enjoyment.

The overall design has little to do with enabling the public to enjoy the special qualities of the National Park and everything to do with making money for Flamingo Land’s owner.

## 03 PROJECT DEVELOPMENT DEVELOPMENT CONSTRAINTS

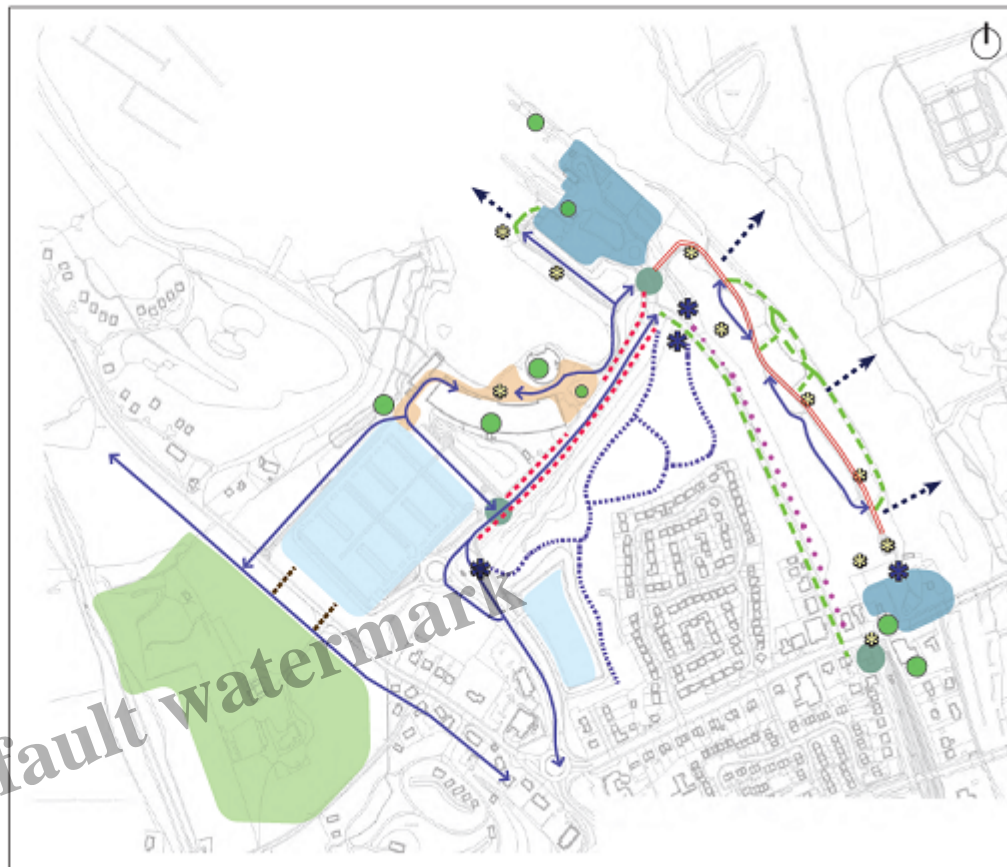
### 3.7 Pedestrian access

The current site provides a series of pedestrian routes that traverse through woodland, open spaces and around the Loch-front. Some longer distance paths continue outwards from the site, including the Loch Lomond Shores Walk, John Muir Way and the Three Lochs Way.

Paths within the site currently vary in surface treatment – ranging through asphalt, concrete, bound gravel and timber edging and low-quality paving. In some locations there is more natural surfacing which can cause problems with accessibility. Pedestrian access points, or 'gateways', can be unwelcoming and would benefit from more detailed consideration of how these tie into wider pedestrian routes and become more prominent.

Throughout the site there is also areas which favour car traffic than foot traffic. This is nowhere more evident than along the Pier-head and Balloch Gateway spaces.

- KEY**
- Current destination points / attractors
  - ➡ Features / views of significance for locals
  - ⚙ Gateway access points (foot traffic)
  - No access along these edges
  - ⚡ Car dominant spaces - conflict for pedestrians
  - ↔ key pedestrian routes
  - Low quality pedestrian routes - issues with accessibility / quality of surfacing
  - ⋯ Woodland footpaths
  - Shared vehicle pedestrian routes
  - Pedestrian priority space
  - Current pedestrian crossing points
  - ⚙ Current provision of facilities such as seating
  - ⋯ Area showing need for pedestrian links
  - Current car-parking locations
  - ⋯ Weak edge treatment - open access
  - Area with currently limited / no public access



Its good this diagram acknowledges the conflict with car parking and pedestrians – but why then are Flamingo Land wanting to increase the amount of the site devoted to car parks?

If you want to understand the attitude of the developer, this map provides a great clue. The green area on the left describes Woodbank House and grounds and is described as “unused”, which is not quite true, and “no public access” which is definitely false. Flamingo Land appears never to have heard of access rights, let alone appreciate why they are important.

## What needs to happen

The LLTNPA’s senior management – or it is their Chief Executive? – clearly support this planning application or they would have never let it get so far. While the LLTNPA Board has a record of rubber stamping proposals from senior management in the past (the Cononish goldmine for example) its possible, if there is enough public outcry and they are given sufficient “planning” reasons to reject the application, that they might do so.

I hope therefore this post might provide some ideas for objections based on the impact Flamingo Land will have on the ability of the public to enjoy what is currently public land. I have appended below the

LLTNPA's policy on open space, a policy which their senior management so far appear to have ignored.

I hope to cover other reasons for objecting in the next few weeks along with further analysis of the rotten Planning Process which had led to the Application. Should the LLTNPA give the go ahead to this Planning Application, there is every reason now for the Scottish Government to call it in for further "independent" scrutiny and its time that people started to call for this to happen. That will add to the political pressure which will ultimately determine what happens.

## **Appendix – LLTNPA open space policy as set out in Local Development Plan**

*Open Space Policy 2:  
Protecting other Important open space*

*Development on formal and informal open space (both inside and outside of towns and villages) in public or private ownership will generally not be supported unless it can be demonstrated that:*

*(a) The open space is not of community value and has no other multifunctional purposes such as cultural, historical, biodiversity or local amenity value; and*

*(b) An alternative high quality formal open space provision within a convenient distance and accessible location is provided; and*

*(c) The proposal complements the principal use of the site and will result in improved maintenance or enhancement of open space; and*

*(d) The proposal complements the nature conservation management of the site.*

*The key principle is to enable tourism development that won't compromise the key landscape experience.*

### **Category**

1. Loch Lomond and Trossachs

### **Tags**

1. access rights
2. Development Plan
3. flamingo land
4. LLTNPA
5. planning
6. Scottish Enterprise
7. Scottish Government

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